

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FILED IN CLERK'S OFFICE  
U.S.D.C. - Atlanta

APR 26 2022

KEVIN P. WEIMER, Clerk  
By: *[Signature]* Deputy Clerk

GLENN WAYNE MITCHELL,  
PLAINTIFF,

v.

CIVIL ACTION FILE  
NO.: 1:21-cv-02260-MHC-JEM

NATIONAL FOOTBALL LEAGUE  
AND ROGER GOODELLS,  
COMMISSIONER,  
DEFENDANTS.

COUNTERCLAIM [PROPOSED] ORDER

PURSUANT to the RULE OF LAW to conform to the requirements of all legal Statute which is the bedrock of justice and fairness. Plaintiff "Motion For Judgment as a Matter of Law and Submission For Summary Judgment request and "Writ of Mandamus" Is hereby ORDERED:

Defendants Motions is Denied; and

Plaintiff Opposition against Defendants Motion for Sanction is Denied;

Plaintiff Opposition against Defendants Motion to Strike is Denied;

Plaintiff Motion For Summary Judgment is Granted ; and

Plaintiff "Writ of Mandamus is Granted.

In a Court ORDER singed [ 1st day of July, 2021] the Judge references the "" THE COURT EXPECT THE CASE TO PROCEED IN A TIMELY MANNER AS SET FORTH IN THE FEDERAL RULES OF CIVIL PROCEDURE AND THE LOCAL RULES OF THE COURT.

Plaintiff assert that the signature of UNITED STATES MAGISTRATE JUDGE: ALAX J. BAVERMAN IS STILL NOTED IN THE COURT RECORDS.

Defendants having not sat-out legal or material facts for reasons other than acts Employment Discrimination of a complaint filed before the court. Plaintiff alleged To seek compensation for pain, suffering,embarrassment, and humiliation.

On June 2nd, 2021 Plaintiff filed a lawsuit pro-se. [Doc.1] in the complaint, Plaintiff Asserts claim against Defendants for unlawful employment discrimination based on Plaintiff race and disability, pursuant to 42 U.S.C./1981, Title of the Civil Right Act Of 1964 ("Title VII") as Amended, 42 U.S. C. // 2000e et. seq. And the American With Disabilities Act ("ADA") ("Title 1"),as amended, 42 U.S. C. //12101 et.seq.and MALICIOUS Prosecution filed in pleadings Plaintiff "NOTICE OF MOTION FOR SUMMARY JUDGMENT" filed on JANUARY 28th, 2022 filed in the CLERKS' OFFICE Awaits the signature of the ORDER as sat-out in the Rule of Laws and Federal Rules Of Civil Procedure and the local rules of the court as ORDERED.

IT IS SO ORDERED, this \_\_\_\_\_ and \_\_\_\_\_.

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JAN 28 2022

KEVIN P. WILSON, Clerk  
By: *[Signature]*  
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

GLENN WAYNE MITCHELL,

Plaintiff,

v.

CIVIL ACTION FILE

NO. 1:21-cv- 02260- MHC-AJB

NATIONAL FOOTBALL LEAGUE

And ROGER GOODELLS,

Commissioner,

Defendants.

NOTICE OF MOTION FOR SUMMARY JUDGMENT

COME NOW, Plaintiff GLENN WAYNE MITCHELL files for a Motion for Summary Judgement. [ Rule 56]

Plaintiff seeks to state as defense as follows:

[42 U.S.C. Civil Rights Code: Title 42; chap. 21; Sub-chap. (1)//1981 as amended...

I.

Plaintiff have provided proof to the court that the Defendants [ NATIONAL FOOTBALL LEAGUE AND ROGER GOODELLS, Commissioner intentionally violated Title VII of the Civil Rights Act of 1964 (Pub.L. 88-352) (Title VII), as amended, as it appears in volume 2000e. Plaintiff is of (African-American) race.

[ Rule 56-1; Rule 56-2 and Rule 56-3].

II.

DEFENDANTS are fully notified that on \_\_\_\_\_ at \_\_\_\_\_ OR AS soon thereafter as Plaintiff Pro-se and counsel can be heard, in courtroom \_\_\_\_\_ of Northern District of Georgia, At the courthouse located at Richard B. Russell Federal Building, 75 Ted Turner Dr., SW , Atlanta, Georgia 30303. GLENN WAYNE MITCHELL, Plaintiff (Pro-se), through and by Federal Rules of Civil Procedure will move the court for Summary Judgment for reasons stated in the above Motion.

Respectfully Submitted,

Date: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

CERTIFICATE OF SERVICE

I hear by certify that on this day I served a true and correct copy of the "CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE" STATEMENT FOR PLAINTIFF (GLENN WAYNE MITCHELL) DEFENDANTS NATIONAL FOOTBALL LEAGUE, PROPERTIES, LLC Successor-in-interest of NFL Properties, NATIONAL FOOTBALL LEAGUE FOUNDATION BOARD OF DIRECTORS and ROGER GOODELLS, COMMISSIONER certificate of Interested Parties upon the Following counsel of record via U.S. Mail to:

Counsel for Defendants:

Terri R. Stewart

Georgia Bar No. 244624

Chinekwu Crystal Enekwa

Fisher and Phillips, LLP

1075 Peachtree Street, N.E.

Suite 3500

Atlanta, Georgia 30039

Respectfully submitted this 26<sup>th</sup> Day of April, 2022

Plaintiff (pro-se) of record:

Glenn Wayne Mitchell

P.O. Box 490354

College Park, Georgia 30349